

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**THE WOODSLANDS PRIDE,  
INC., *et al.*,  
*Plaintiffs,***

**v.**

**ANGELA COLMENERO, in her  
official capacity as Provisional  
Attorney General of Texas, *et al.*,  
*Defendants.***

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**CIVIL ACTION NO. 4:23-CV-2847**

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**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE  
TO FILE RESPONSE IN EXCESS OF PAGE LIMIT**

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Angela Colmenero, in her official capacity as Provisional Attorney General for the State of Texas, (“Colmenero”) respectfully requests leave of Court to file her combined Motion to Dismiss under Rules 12(b)(1) and 12(b)(6) and Response to Plaintiffs’ Motion for Preliminary Injunction in excess of the 20-page limit.

The excess pages are necessary to adequately present Defendant’s arguments, which respond to claims and arguments contained in both Plaintiffs’ 43-page complaint and 56-page Motion for Preliminary Injunction. Moreover, Defendant’s pleading addresses the claims of five groups of Plaintiffs whose claims and rights vary and require individual responses.

Defendant used approximately 44 pages at 14-point font, exclusive of caption, signature, and certificate of service, to put forth her argument and incorporate its evidence. Local Rule CV-7(d)(3) caps a response to a motion at 20-pages.

Wherefore, Defendant respectfully requests the Court grant this motion and allow the filing of Defendant's Response to Plaintiffs' Motion for Expedited Preliminary Injunction in excess of the page limit for a response to a motion.

Dated: August 23, 2023.

Respectfully submitted,

ANGELA COLMENERO  
Provisional Attorney General

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

JAMES LLOYD  
Acting Deputy Attorney General for Civil  
Litigation

/s/Taylor Gifford

**TAYLOR GIFFORD**  
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*ATTORNEYS FOR DEFENDANT ANGELA  
COLMENERO, IN HER OFFICIAL CAPACITY  
AS PROVISIONAL ATTORNEY GENERAL OF  
TEXAS*

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on August 23, 2023.

/s/ Taylor Gifford  
Taylor Gifford